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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
King Highway Landfill Operable Unit 3 Progress Report (February 2012)

ENVIRONMENT

Dear Keith:

Date:  
March 1, 2012

Attached is the February 2012 Monthly Progress Report for the King Highway Landfill Operable Unit 3 (KHL OU) of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) as per Section XVI of the Administrative Order by Consent for the Remedial Design/Remedial Action at the KHL OU, as was fully executed on February 8, 2000 (AOC). Please note, however, pursuant to Section XVI of the AOC, after a Certificate of Completion of Construction is issued by the Michigan Department of Environmental Quality (MDEQ), as provided in Section XXVII (Certificate of Completion of Construction) of the AOC, progress reports shall be submitted pursuant to the schedules set forth in the plans identified in the Statement of Work.

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Our ref:  
B0064583.0003.00675

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Patrick McGuire  
Principal Environmental Engineer

Attachment

Copies:

Garry Griffith, P.E., Georgia-Pacific LLC  
Daria Devantier, Michigan Department of Environmental Quality  
Michael Berkoff, USEPA Region 5  
Dawn Penniman, P.E., ARCADIS

**MONTHLY PROGRESS REPORT FOR THE KING HIGHWAY LANDFILL OPERABLE UNIT 3 OF THE  
ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE**

**FEBRUARY 2012**

**PREPARED MARCH 1, 2012**

**ON BEHALF OF GEORGIA-PACIFIC LLC**

**SUBMITTED TO**

**KEITH KRAWCZYK, PROJECT COORDINATOR  
REMEDIATION AND REDEVELOPMENT DIVISION**

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY**

**MONTHLY PROGRESS REPORT FOR THE KING HIGHWAY LANDFILL OPERABLE UNIT 3 OF THE  
ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE**

**FEBRUARY 2012**

**Remedial Activities**

- On February 1, ARCADIS submitted to MDEQ the January 2012 Monthly Progress Report.

**Operation, Maintenance and Monitoring Activities**

- On February 9, Terra Contracting, LLC (Terra Contracting) conducted the 2012 1<sup>st</sup> quarter post-closure landfill inspection.
- In February, Terra Contracting installed new warning signs along the sheetpile wall and fencing on the east side of the KHL, and additional warning signs along the fencing on the south side of the KHL in accordance with the AOC specifications for perimeter warning signs.
- On February 16, ARCADIS conducted the 2012 1<sup>st</sup> quarter post-closure landfill gas monitoring event. That same day, ARCADIS replaced all of the valves on gas probes (GW-1 through GW-17), with the exception of GW-9 through GW-11 as the original valves could not be removed. In addition, bolts were replaced on flush-mounted gas probes where the bolts were previously missing.
- On February 17, MDEQ notified ARCADIS via e-mail that MDEQ had identified an area having dead vegetation and subsidence of the landfill cover system on the north side of the KHL south of the access road.
- On February 27, MDEQ provided Georgia-Pacific with aerial images of the northern portion of the KHL, indicating the area of dead vegetation and subsidence immediately south of the berm on the north side of the landfill. MDEQ proposed to have landfill engineers from MDEQ and ARCADIS meet onsite to review the area and evaluate potential solutions for the subsiding and dead vegetation. In addition, MDEQ indicated that there was a large area of "iron bacteria" in the area of the north pore water outfall, and that this area should also be inspected.
- On February 29, ARCADIS provided MDEQ with post-remediation landfill inspection reports from March 2003 through February 2012.

**Upcoming Activities**

- Replacement of the valves on gas probes GW-9 through GW-11 will be completed prior to the next monitoring event, slated for May 2012.
- Georgia-Pacific, MDEQ, and USEPA will participate in a conference call on March 8 to discuss a course of action for the two MDEQ concerns associated with the area identified to have dead vegetation and subsidence on the north side of the landfill to determine possible solutions; and the area at the north pore water outfall where "iron bacteria" was observed.

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**FEBRUARY 2012**

- Georgia-Pacific awaits MDEQ's comments on the revised Draft Final Operation and Maintenance Plan (Deliverable 12) and the revised Draft Final Report for Completion of Construction (Deliverable 14), which were submitted to MDEQ on January 19 and 20, 2012, respectively.